

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL,

Plaintiff,

v.

DONALD J. TRUMP,

Defendant.

No. 22 Civ. 10016 (LAK) (JLC)

DECLARATION OF ROBERTA A. KAPLAN IN SUPPORT
OF PLAINTIFF E. JEAN CARROLL'S REPLY
IN SUPPORT OF HER OMNIBUS MOTION IN LIMINE

I, Roberta A. Kaplan, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a member of the bar of the State of New York and am admitted to appear before this Court. I am a partner in the law firm Kaplan Hecker & Fink LLP, counsel for Plaintiff E. Jean Carroll in the above-captioned action.

2. I respectfully submit this declaration in support of Carroll's reply in support of her omnibus motion in limine.

3. Attached hereto as **Exhibit 1** is a true and correct copy of Defendant Donald J. Trump's Rule 26(a)(1) Initial Disclosures in this action, dated January 9, 2023.

4. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from the official transcript of Carroll's deposition, which was taken in the related action, *Carroll v. Trump*, No. 20 Civ. 7311 (S.D.N.Y.) ("*Carroll I*"), on October 14, 2022.

5. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts from the official transcript of Robert J. Fisher's deposition, which was taken in this action on February 6, 2023.

6. Attached hereto as **Exhibit 4** is a true and correct copy of the Expert Report of Robert J. Fisher, dated January 30, 2023.

7. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts from the official transcript of Robert J. Fisher's deposition, which was taken in *Carroll I* on December 14 and 20, 2022.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
March 16, 2023



Roberta A. Kaplan